

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
DEL RIO DIVISION**

OSCAR ORONA IANF of N.O., <i>a minor</i> , et al.,	§	
	§	
Plaintiffs,	§	
v.	§	No. 2:24-cv-00049-AM
	§	
CHRISTOPHER KINDELL, an individual, et al.,	§	
	§	
Defendants.	§	
	§	

**DEFENDANT MOTOROLA SOLUTIONS, INC.'S ANSWER AND
AFFIRMATIVE DEFENSES TO PLAINTIFFS' AMENDED ORIGINAL COMPLAINT**

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ATTORNEYS FOR DEFENDANT
MOTOROLA SOLUTIONS, INC.

Defendant Motorola Solutions, Inc. (“Motorola”), by its undersigned attorneys, answers Plaintiffs’ Amended Original Complaint (“Complaint”) as follows:

I. INTRODUCTION

1. In response to paragraph 1 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

2. In response to paragraph 2 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

3. In response to paragraph 3 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

4. In response to paragraph 4 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

5. In response to paragraph 5 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

6. In response to paragraph 6 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

7. In response to paragraph 7 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

8. In response to paragraph 8 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

9. In response to paragraph 9 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

10. In response to paragraph 10 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

11. In response to paragraph 11 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

12. In response to paragraph 12 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

13. In response to paragraph 13 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

14. In response to paragraph 14 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

15. In response to paragraph 15 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

16. In response to paragraph 16 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

17. In response to paragraph 17 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

18. In response to paragraph 18 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

II. JURISDICTION AND VENUE

19. In response to paragraph 19 of the Complaint, Motorola states that this is a legal conclusion which is not subject to denial or admission. To the extent a response is required, Motorola admits that Plaintiff has brought this case pursuant to 42 U.S.C. § 1983 and under state law.

20. In response to paragraph 20 of the Complaint, Motorola admits that Plaintiffs have alleged jurisdiction based upon 28 U.S.C. §§ 1331 and 1343 and 42 U.S.C. § 1367.

21. In response to paragraph 21 of the Complaint, Motorola admits that Plaintiffs' alleged venue is proper pursuant to 28 U.S.C. §§ 1391(b)(1) and (2).

III. THE PARTIES

A. PLAINTIFFS

22. In response to paragraph 22 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

23. In response to paragraph 23 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

24. In response to paragraph 24 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

25. In response to paragraph 25 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

26. In response to paragraph 26 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

27. In response to paragraph 27 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

28. In response to paragraph 28 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

29. In response to paragraph 29 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

B. DEFENDANTS

i. Texas Department of Public Safety Defendants

30. In response to paragraph 30 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

31. In response to paragraph 31 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

32. In response to paragraph 32 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

33. In response to paragraph 33 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

34. In response to paragraph 34 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

35. In response to paragraph 35 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

36. In response to paragraph 36 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

37. In response to paragraph 37 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

38. In response to paragraph 38 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

ii. Uvalde Consolidated Independent School District Defendants

39. In response to paragraph 39 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

40. In response to paragraph 40 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

41. In response to paragraph 41 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

42. In response to paragraph 42 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

43. In response to paragraph 43 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

44. In response to paragraph 44 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

iii. Motorola Solutions, Inc.

45. In response to paragraph 45 of the Complaint, Motorola admits it is a Delaware corporation with its principal office in Chicago, Illinois. Motorola also admits that it supplied components of a radio system to the Middle Rio Grande Development Council (“MRGDC”). Motorola also provided published system specifications to customer, as well as services to ensure the equipment was installed correctly. Motorola further admits that it did provided a system designed to maximize wide-area coverage in rural areas, not in-building coverage, as the customer, MRGDC requested.

Except as specifically admitted, Motorola denies, generally and specifically, each and every remaining allegation of paragraph 45 of the Complaint.

IV. ALLEGATIONS APPLICABLE TO ALL COUNTS

46. In response to paragraph 46 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

A. The Rise of School Shootings in America and the Vulnerability of Our Schools

47. In response to paragraph 47 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

48. In response to paragraph 48 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

49. In response to paragraph 49 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

50. In response to paragraph 50 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

51. In response to paragraph 51 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

52. In response to paragraph 52 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

53. In response to paragraph 53 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

54. In response to paragraph 54 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

55. In response to paragraph 55 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

56. In response to paragraph 56 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

57. In response to paragraph 57 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

58. In response to paragraph 58 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

59. In response to paragraph 59 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

60. In response to paragraph 60 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

61. In response to paragraph 61 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

62. In response to paragraph 62 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

B. State-Mandated Lockdown Protocols Direct Students and Teachers to Stay Still and Silent until Law Enforcement Officers Release Them

63. In response to paragraph 63 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

64. In response to paragraph 64 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

65. In response to paragraph 65 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

66. In response to paragraph 66 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

67. In response to paragraph 67 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

68. In response to paragraph 68 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

69. In response to paragraph 69 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

70. In response to paragraph 70 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

71. In response to paragraph 71 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

72. In response to paragraph 72 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

73. In response to paragraph 73 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

74. In response to paragraph 74 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

75. In response to paragraph 75 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

76. In response to paragraph 76 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

77. In response to paragraph 77 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

78. In response to paragraph 78 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

C. In an Active Shooter Incident, Law Enforcement Officers Must Immediately Isolate and Neutralize the Shooter

79. In response to paragraph 79 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

80. In response to paragraph 80 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

81. In response to paragraph 81 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

82. In response to paragraph 82 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

83. In response to paragraph 83 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

84. In response to paragraph 84 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

85. In response to paragraph 85 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

86. In response to paragraph 86 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

87. In response to paragraph 87 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

88. In response to paragraph 88 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

89. In response to paragraph 89 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

90. In response to paragraph 90 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

91. In response to paragraph 91 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

92. In response to paragraph 92 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

D. Law Enforcement Officers Who Confine an Active Shooter with Locked Down Children and Teachers Create a Death Trap

93. In response to paragraph 93 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

94. In response to paragraph 94 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

95. In response to paragraph 95 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

96. In response to paragraph 96 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

97. In response to paragraph 97 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

98. In response to paragraph 98 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

99. In response to paragraph 99 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

100. In response to paragraph 100 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

101. In response to paragraph 101 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

E. Robb Elementary School

102. In response to paragraph 102 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

103. In response to paragraph 103 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

104. In response to paragraph 104 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

F. Going to School on the Morning of Tuesday, May 24, 2022

105. In response to paragraph 105 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

106. In response to paragraph 106 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

107. In response to paragraph 107 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

108. In response to paragraph 108 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

109. In response to paragraph 109 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

110. In response to paragraph 110 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

111. In response to paragraph 111 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

112. In response to paragraph 112 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

113. In response to paragraph 113 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

114. In response to paragraph 114 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

115. In response to paragraph 115 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

G. The Active Shooter Approaches Robb Elementary School

116. In response to paragraph 116 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

117. In response to paragraph 117 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

118. In response to paragraph 118 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

119. In response to paragraph 119 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

120. In response to paragraph 120 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

121. In response to paragraph 121 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

122. In response to paragraph 122 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

123. In response to paragraph 123 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

124. In response to paragraph 124 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

125. In response to paragraph 125 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

126. In response to paragraph 126 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

127. In response to paragraph 127 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

128. In response to paragraph 128 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

H. The Active Shooter Enters Robb Elementary School West Building

129. In response to paragraph 129 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

130. In response to paragraph 130 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

131. In response to paragraph 131 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

132. In response to paragraph 132 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

133. In response to paragraph 133 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

134. In response to paragraph 134 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

135. In response to paragraph 135 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

136. In response to paragraph 136 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

137. In response to paragraph 137 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

138. In response to paragraph 138 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

139. In response to paragraph 139 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

140. In response to paragraph 140 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

141. In response to paragraph 141 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

142. In response to paragraph 142 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

143. In response to paragraph 143 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

144. In response to paragraph 144 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

145. In response to paragraph 145 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

146. In response to paragraph 146 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

147. In response to paragraph 147 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

148. In response to paragraph 148 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

I. Defendant Officers from the TXDPS Arrive on Scene within Two Minutes of the Shooter Entering the School, While the Shooter is Shooting Inside Classrooms 111 and 112

149. In response to paragraph 149 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

150. In response to paragraph 150 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

151. In response to paragraph 151 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

152. In response to paragraph 152 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

153. In response to paragraph 153 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

154. In response to paragraph 154 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

J. Defendant UCISD-PD Officers Retreat, Trapping Students and Teachers with the Active Shooter, While Defendant TXDPS Officers Hesitate

155. In response to paragraph 155 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

156. In response to paragraph 156 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

157. In response to paragraph 157 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

158. In response to paragraph 158 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

159. In response to paragraph 159 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

160. In response to paragraph 160 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

161. In response to paragraph 161 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

162. In response to paragraph 162 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

163. In response to paragraph 163 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

164. In response to paragraph 164 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

165. In response to paragraph 165 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

166. In response to paragraph 166 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

167. In response to paragraph 167 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

168. In response to paragraph 168 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

169. In response to paragraph 169 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

170. In response to paragraph 170 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

171. In response to paragraph 171 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

K. The Uvalde County District Attorney's Office Alerts Defendant TXDPS Ranger Kindell about the Active Shooting

172. In response to paragraph 172 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

173. In response to paragraph 173 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

174. In response to paragraph 174 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

175. In response to paragraph 175 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

176. In response to paragraph 176 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

L. Officers, Including Law Enforcement Defendants, Knew There Were Students and Teachers in Classrooms 111 and 112 and They Kept Those Students and Teachers Trapped with the Shooter

177. In response to paragraph 177 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

178. In response to paragraph 178 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

179. In response to paragraph 179 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

180. In response to paragraph 180 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

181. In response to paragraph 181 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

182. In response to paragraph 182 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

183. In response to paragraph 183 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

184. In response to paragraph 184 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

185. In response to paragraph 185 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

186. In response to paragraph 186 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

187. In response to paragraph 187 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

188. In response to paragraph 188 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

189. In response to paragraph 189 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

190. In response to paragraph 190 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

191. In response to paragraph 191 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

192. In response to paragraph 192 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

193. In response to paragraph 193 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

194. In response to paragraph 194 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

195. In response to paragraph 195 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

196. In response to paragraph 196 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

197. In response to paragraph 197 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

M. Officers, Including Defendants, Stop Parents from Rescuing the Children Trapped in Classrooms 111 and 112

198. In response to paragraph 198 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

199. In response to paragraph 199 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

200. In response to paragraph 200 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

201. In response to paragraph 201 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

202. In response to paragraph 202 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

203. In response to paragraph 203 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

204. In response to paragraph 204 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

N. Officers Saved Themselves, Not Children, from the Shooter's Lethal Battle Riffle

205. In response to paragraph 205 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

206. In response to paragraph 206 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

207. In response to paragraph 207 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

208. In response to paragraph 208 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

209. In response to paragraph 209 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

210. In response to paragraph 210 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

211. In response to paragraph 211 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

212. In response to paragraph 212 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

O. Officers, Including Defendants, Are Indifferent to the Fact That a Teacher is Dying Inside Classroom 112

213. In response to paragraph 213 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

214. In response to paragraph 214 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

215. In response to paragraph 215 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

216. In response to paragraph 216 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

217. In response to paragraph 217 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

218. In response to paragraph 218 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

219. In response to paragraph 219 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

220. In response to paragraph 220 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

221. In response to paragraph 221 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

222. In response to paragraph 222 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

223. In response to paragraph 223 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

224. In response to paragraph 224 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

225. In response to paragraph 225 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

226. In response to paragraph 226 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

227. In response to paragraph 227 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

228. In response to paragraph 228 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

229. In response to paragraph 229 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

230. In response to paragraph 230 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

231. In response to paragraph 231 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

232. In response to paragraph 232 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

233. In response to paragraph 233 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

234. In response to paragraph 234 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

235. In response to paragraph 235 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

236. In response to paragraph 236 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

237. In response to paragraph 237 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

238. In response to paragraph 238 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

239. In response to paragraph 239 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

240. In response to paragraph 240 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

241. In response to paragraph 241 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

242. In response to paragraph 242 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

243. In response to paragraph 243 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

244. In response to paragraph 244 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

245. In response to paragraph 245 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

246. In response to paragraph 246 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

247. In response to paragraph 247 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

248. In response to paragraph 248 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

249. In response to paragraph 249 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

250. In response to paragraph 250 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

251. In response to paragraph 251 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

252. In response to paragraph 252 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

P. Officers' Decision to Contain the Shooter with His Victims Caused Children to Suffcer and Die

253. In response to paragraph 253 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

254. In response to paragraph 254 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

255. In response to paragraph 255 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

256. In response to paragraph 256 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

257. In response to paragraph 257 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

258. In response to paragraph 258 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

259. In response to paragraph 259 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

260. In response to paragraph 260 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

261. In response to paragraph 261 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

Q. Plaintiffs Have Received Little Transparency and No Accountability

262. In response to paragraph 262 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

263. In response to paragraph 263 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

264. In response to paragraph 264 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

265. In response to paragraph 265 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

266. In response to paragraph 266 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

267. In response to paragraph 267 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

268. In response to paragraph 268 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

269. In response to paragraph 269 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

270. In response to paragraph 270 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

271. In response to paragraph 271 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

272. In response to paragraph 272 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

273. In response to paragraph 273 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

274. In response to paragraph 274 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

275. In response to paragraph 275 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

276. In response to paragraph 276 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

V. FIRST CAUSE OF ACTION:
ALL PLAINTIFFS AGAINST TXDPS DEFENDANTS AND
INDIVIDUAL UCISD-PD DEFENDANTS
VIOLATION OF 42 U.S.C. § 1983 (VIOLATION OF FOURTEENTH AMENDMENT,
SUBSTANTIVE DUE PROCESS CLAUSE/SPECIAL RELATIONSHIP)

277. In response to paragraph 277 of the Complaint, Motorola admits those limited allegations that were previously admitted and denies those allegations that were previously denied.

278. In response to paragraph 278 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

279. In response to paragraph 279 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

280. In response to paragraph 280 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

281. In response to paragraph 281 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

282. In response to paragraph 282 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

283. In response to paragraph 283 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

284. In response to paragraph 284 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

285. In response to paragraph 285 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

286. In response to paragraph 286 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

287. In response to paragraph 287 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

288. In response to paragraph 288 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

289. In response to paragraph 299 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

290. In response to paragraph 290 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

291. In response to paragraph 291 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

292. In response to paragraph 292 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

293. In response to paragraph 293 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

294. In response to paragraph 294 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

295. In response to paragraph 295 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

296. In response to paragraph 296 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

297. In response to paragraph 297 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

298. In response to paragraph 298 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

299. In response to paragraph 299 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

300. In response to paragraph 300 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

301. In response to paragraph 301 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

302. In response to paragraph 302 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

303. In response to paragraph 303 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

304. In response to paragraph 304 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

VI. SECOND CAUSE OF ACTION:
ALL PLAINTIFFS AGAINST TXDPS DEFENDANTS
AND INDIVIDUAL UCISD-PD DEFENDANTS
VIOLATION OF 42 U.S.C. § 1983
(SUBSTANTIVE DUE PROCESS CLAUSE, STATE CREATED DANGER)

305. In response to paragraph 305 of the Complaint, Motorola admits those limited allegations that were previously admitted and denies those allegations that were previously denied.

306. In response to paragraph 306 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

307. In response to paragraph 307 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

308. In response to paragraph 308 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

309. In response to paragraph 309 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

310. In response to paragraph 310 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

311. In response to paragraph 311 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

312. In response to paragraph 312 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

313. In response to paragraph 313 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

314. In response to paragraph 314 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

315. In response to paragraph 315 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

316. In response to paragraph 316 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

317. In response to paragraph 317 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

VII. THIRD CAUSE OF ACTION:
ALL PLAINTIFFS AGAINST TXDPS DEFENDANTS
AND INDIVIDUAL UCISD-PD DEFENDANTS
VIOLATION OF 42 U.S.C. § 1983
(VIOLATION FOURTH AMENDMENT, UNLAWFUL SEIZURE)

318. In response to paragraph 318 of the Complaint, Motorola admits those limited allegations that were previously admitted and denies those allegations that were previously denied.

319. In response to paragraph 319 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

320. In response to paragraph 320 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

321. In response to paragraph 321 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

VIII. FOURTH CAUSE OF ACTION:
ALL PLAINTIFFS AGAINST DEFENDANT ARREDONDO
IN HIS OFFICIAL CAPACITY AND UCISD
VIOLATION OF 42 U.S.C. § 1983
(VIOLATION FOURTH AND FOURTEENTH AMENDMENT, FAILURE TO
TRAIN/CREATION OF POLICY)

322. In response to paragraph 322 of the Complaint, Motorola admits those limited allegations that were previously admitted and denies those allegations that were previously denied.

323. In response to paragraph 323 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

324. In response to paragraph 324 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

325. In response to paragraph 325 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

326. In response to paragraph 326 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

327. In response to paragraph 327 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

328. In response to paragraph 328 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

329. In response to paragraph 329 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

330. In response to paragraph 330 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

IX. FIFTH CAUSE OF ACTION:
ALL PLAINTIFFS AGAINST DEFENDANT ARREDONDO
IN HIS OFFICIAL CAPACITY AND UCISD
VIOLATION OF 42 U.S.C. § 1983
(FOURTEENTH AMENDMENT SPECIAL RELATIONSHIP AND STATE CREATED
DANGER, FAILURE TO TRAIN/CREATION OF POLICY)

331. In response to paragraph 331 of the Complaint, Motorola admits those limited allegations that were previously admitted and denies those allegations that were previously denied.

332. In response to paragraph 332 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

333. In response to paragraph 333 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

334. In response to paragraph 334 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

335. In response to paragraph 335 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

X. SIXTH CAUSE OF ACTION:
ALL PLAINTIFFS AGAINST MOTOROLA SOLUTIONS, INC.
PRODUCTS LIABILITY – FAILURE TO WARN

336. In response to paragraph 336 of the Complaint, Motorola admits those limited allegations that were previously admitted and denies those allegations that were previously denied.

337. In response to paragraph 337 of the Complaint, Motorola denies the statements and allegations as they constitute a legal conclusion to which no response is required. To the extent a response is required, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

338. In response to paragraph 338 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

339. In response to paragraph 339 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

340. In response to paragraph 340 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

341. In response to paragraph 341 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

342. In response to paragraph 342 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

343. In response to paragraph 343 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

344. In response to paragraph 344 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

345. In response to paragraph 345 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

XI. SEVENTH CAUSE OF ACTION:
AGAINST MOTOROLA SOLUTIONS, INC.
PRODUCTS LIABILITY – MANUFACTURING DEFECT

346. In response to paragraph 346 of the Complaint, Motorola admits those limited allegations that were previously admitted and denies those allegations that were previously denied.

347. In response to paragraph 347 of the Complaint, Motorola denies the statements and allegations as they constitute a legal conclusion to which no response is required. To the extent a response is required, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

348. In response to paragraph 348 of the Complaint, Motorola is without knowledge or information sufficient to form a belief as to the truth of the allegations contained therein and, on that basis, denies, generally and specifically, each and every allegation contained therein.

349. In response to paragraph 349 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

350. In response to paragraph 350 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

351. In response to paragraph 351 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

352. In response to paragraph 352 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

353. In response to paragraph 353 of the Complaint, Motorola denies, generally and specifically, each and every allegation contained therein.

XII. AFFIRMATIVE DEFENSES

354. Motorola sets forth the following affirmative defenses to the Complaint. Motorola reserves the right to assert additional affirmative defenses at such time and to such extent as warranted by discovery and the factual developments in this case.

355. The Complaint fails to set forth facts sufficient to state claims upon which relief may be granted against Motorola and further fails to state facts sufficient to entitle Plaintiffs to the relief sought or to any relief whatsoever.

356. Motorola did not owe any duty of care to Plaintiffs under the circumstances, as its customer was MRGDC and government users. To the extent Motorola owed any duty of care, it fulfilled such duty.

357. Plaintiffs' alleged injuries are attributable to one or more persons from whom Plaintiff does not seek recovery in this action.

358. Any alleged injury or damages sustained by Plaintiff were not caused by Motorola, but by the acts or omissions of persons other than Motorola over whom Motorola had no control.

359. Any alleged injury or damages sustained by Plaintiffs were not caused by Motorola, but by intervening and superseding causes.

XIII. PRAYER

WHEREFORE, Defendant Motorola respectfully prays for relief as follows:

- (i) that the Court deny each and every claim, cause of action, and request for damages by Plaintiffs against Motorola;
- (ii) that the Court dismiss with prejudice all claims brought against Motorola by Plaintiffs;
- (iii) that the Court enter judgment in favor of Motorola;
- (iv) that the Court award to Motorola all of their costs, including attorneys' fees, to the full extent permitted by the law; and,
- (v) that the Court grant such other legal or equitable relief to which Motorola may be entitled.

Dated: June 20, 2024

Respectfully submitted,

/s/ Pete D. Laun

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ATTORNEYS FOR DEFENDANT
MOTOROLA SOLUTIONS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2024, I caused the foregoing to be electronically filed with the Clerk of Court for the U.S. District Court, Western District of Texas, by using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ Pete D. Laun
Pete D. Laun